

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTOR, INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA, 189 SUNRISE HIGHWAY AUTO, LLC., NORTSHORE MOTOR LEASING, LLC., BRIAN CHABRIER, individually and derivatively as member of NORTSHORE MOTOR LEASING, LLC., JOSHUA AARONSON, individually and derivatively as a member of 189 SUNRISE HWY AUTO, LLC., JORY BARON, 1581 HYLAN BLVD AUTO, LLC., 1580 HYLAN BLVD AUTO, LLC., 1591 HYLAND BLVD AUTO, LLC., 1632 HYLAN BLVD AUTO, LLC., 1239 HYLAN BLVD AUTO, LLC., 2519 HYLAND BLVD AUTO, LLC., 76 FISK STREET REALTY, LLC., 446 ROUTE 23 AUTO, LLC., and ISLAND AUTO MANAGEMENT, LLC.,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC, INC., GOLD COAST CARS OF SYOSSET, LLC., GOLD COAST CARS OF SUNRISE, LLC., GOLD COAST MOTORS AUTOMOTIVE GROUP, LLC., GOLD COAST MOTORS OF LIC, LLC., GOLD COAST MOTORS OF ROSLYN, LLC., GOLD COAST MOTORS OF SMITHTOWN, LLC., UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS, INC., JONES, LITTLE & Co., CPA'S, LLP., FLUSHING BANK, LIBERTAS FUNDING, LLC, and J.P. MORGAN CHASE BANK, N.A.

Defendants.

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Case No. 2:23-cv-6188  
(JMW)

**DECLARATION OF  
BRIAN M. LEVINE**

Brian M. Levine, Esq., declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court, and am a partner of Levine Singh, LLP, attorneys for Defendants Anthony Deo, Sarah Deo, Harry Thomasson, Dwight Blankenship, Marc Merckling, Michael Laurie, Car Buyers NYC, INC., Gold Coast Cars of Syosset, LLC., Gold Coast Cars of Sunrise, LLC., Gold Coast Motors Automotive Group, LLC., Gold Coast Motors Of LIC, LLC., Gold Coast Motors of Roslyn, LLC., Gold Coast Motors of Smithtown, LLC., UEA Premier

Motors Corp (the “Defendants” or “Deo Defendants”) in the instant action, and as such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of the file maintained by my office.

2. Attached hereto as **Exhibit A**, are true and correct copies of photographs exchanged by the Superb Plaintiffs on January 13, 2025 showing the odometer statements for the following nine (9) Injuncted Vehicles:

- (1) **2019 Mercedes GT** – VIN #WDD7X8KB7KA001866
- (2) **2018 Land Rover Sport** – VIN #SALWR2RV8JA189351
- (3) **2018 Alfa Romeo Gulia** – VIN #ZARFAEDN3J7575105
- (4) **2018 Dodge Durango** – VIN #1C4RDHDG7JC438967
- (5) **2016 Porsche Panamera** – VIN #WP0AF2A74GL082172
- (6) **2020 Mercedes GT** – VIN #W1K7X6BB7LA016406
- (7) **2019 Range Rover** – VIN #SALGS2RE3KA519794
- (8) **2018 Mercedes SL** – VIN #WDDJK7DA4JF052861
- (9) **2019 Maserati Ghibli** – VIN #ZAM57YTA4K1314330

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 7, 2024.

/s/ Brian M. Levine, Esq.  
Brian M. Levine, Esq.